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**THE CITY OF NEW YORK
LAW DEPARTMENT**
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BY HAND

October 19, 2005

The Honorable Kenneth M. Karas
United States District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 920
New York, New York 10007-1312

Re: Concepcion v. City of New York, et al. 05 CV 8501 (KMK)

Dear Judge Karas:

I am an Assistant Corporation Counsel with the City of New York and I write in connection with the case captioned above, which is one of the cases that arises from arrests made during the Republican National Convention. We represent Defendant the City of New York ("Defendant") in this matter.

On or about September 16, 2005, Defendant was served with the Complaint in this case. The Complaint was originally filed in state court and then successfully removed to the Southern District of New York pursuant to Defendant's October 3, 2005 Notice of Removal. Defendant respectfully requests additional time to answer or otherwise move with respect to the Complaint. Defendant needs this extension to investigate the allegations of the Complaint. We believe that records of the underlying criminal action against Plaintiff Jody Concepcion, including police records, have been sealed pursuant to New York Criminal Procedure Law § 160.50. We have forwarded to Plaintiff's counsel a consent and authorization for the release of sealed records, so that Defendant can access that information and properly respond to the Complaint.

For the foregoing reasons, Defendant requests a sixty day enlargement, which would make the due date December 5, 2005 for answering or otherwise moving with respect to the Complaint. Counsel for the Plaintiff, Karen Wohlforth, Esq., has kindly consented to the sixty day extension. We have not previously requested an extension of time to answer the Complaint. If this meets with your approval, would you kindly "so order" it?

Very truly yours,

Jay A. Kranis, Senior Counsel (JK 2576)

Jeffrey A. Dougherty, Assistant Corporation Counsel (JD 5224)

*Defendants are given until December 5, 2005
to answer or otherwise respond to the Complaint.*

cc: Karen Wohlforth, Esq. (by Facsimile)
Republican National Committee (by PDF)

SO ORDERED

KENNETH M. KARAS U.S.D.J.
10/20/05